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VIA FAX

March 5, 2013

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Honorable Harold Baer
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Reynolds, 12 Cr. 708 (HB)

Dear Judge Baer:

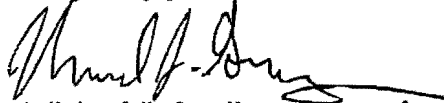
We are the attorneys for Defendant John Reynolds in the above-captioned case. We write to seek an adjournment of the pretrial conference scheduled for this Thursday, March 7. The government, by AUSA Christopher Frey, has indicated it has no objection to this application.

We seek the adjournment because the matter had been set down by the Court (at the December 13 conference) for oral argument on motions against the indictment to be filed by Mr. Reynolds. Mr. Reynolds has not served any motions, and the parties have engaged instead in discussions toward a possible disposition. We would ask the Court for a date in April to report on the status and set any necessary schedules. (In the alternative, if the Court wishes to maintain the March 7 appearance in place, we would ask leave to waive Mr. Reynolds's personal appearance as he would need to travel from his home in Cape Cod.) In the meantime, Mr. Reynolds consents to the exclusion of Speedy Trial Act time to any adjourned date the Court would consider.

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We thank Your Honor for your attention to this request, and are available to answer any questions.

Very truly yours,


Michael J. Grudberg

MJG/mm

cc: AUSA Christopher Frey (via e-mail)

5/5/13 Denied — by her
on the 7th with a
proposed trial date
soon — or I will set one
for you —
SOONEST
Harold Samy
VSD

Endorsement:

Denied - be here on the 7th with a proposed trial date soon or I will set one for you.